

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AHMED ARFA, Individually And  
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

MECOX LANE LIMITED, NEIL NANPENG  
SHEN, JOHN J. YING, PAUL BANG ZHANG,  
ALFRED BEICHUN GU, KELVIN KENLING  
YU, ANTHONY KAI YIU LO, DAVID JIAN  
SUN, UBS AG, and CREDIT SUISSE  
SECURITIES (USA) LLC,

Defendants.

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CIVIL ACTION NO. 10-cv-9053

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WALTER P. BRADY, Individually And  
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

MECOX LANE LIMITED, NEIL NANPENG  
SHEN, JOHN J. YING, PAUL BANG ZHANG,  
ALFRED BEICHUN GU, KELVIN KENLING  
YU, ANTHONY KAI YIU LO, DAVID JIAN  
SUN, UBS AG, CREDIT SUISSE  
SECURITIES (USA) LLC, OPPENHEIMER &  
CO. INC. and ROTH CAPITAL PARTNERS,  
LLC,

Defendants.

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CIVIL ACTION NO. 11-cv-0034

**DECLARATION OF KIM E. MILLER IN SUPPORT OF THE MOTION OF WESTEND TO CONSOLIDATE RELATED ACTIONS; TO APPOINT LEAD PLAINTIFF; AND TO APPROVE PROPOSED LEAD PLAINTIFF'S CHOICE OF COUNSEL**

I, Kim E. Miller, hereby declare as follows:

1. I am a member in good standing of the bar of New York, and a member of the law firm of Kahn Swick & Foti, LLC, proposed Lead Counsel for Movant, Westend Group (comprised of Westend Partners, L.P. and the Cooper Family Trust). I submit this declaration in support of the motion filed by Westend to: (1) consolidate all future related cases; (2) to be appointed as Lead Plaintiff; and (3) to approve Proposed Lead Plaintiff's selection of Co-Lead Counsel for the Class.

2. Attached as exhibits are true and correct copies of the following:

Exhibit A: Certification of the Westend Group (comprised of Westend Partners, L.P. and the Cooper Family Trust) along with a detailed listing of transactions in Mecox Lane Limited common stock during the Class Period.

Exhibit B: Published Notice on *Business Wire* on December 3, 2010, of the first securities class action complaint filed, in this matter, in the United States District Court for the Southern District of New York.

Exhibit C: Firm Biography for Proposed Co-Lead Counsel, Kahn Swick & Foti, LLC.

Exhibit D: Firm Biography for Proposed Co-Lead Counsel, Pomerantz Haudek Grossman & Gross, LLP.

I declare under penalty of perjury under the laws of the state of New York that the foregoing facts are true and correct.

Executed this 1<sup>st</sup> day of February, 2011, at New York, New York.

/s/ Kim E. Miller  
KIM E. MILLER